

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America,)	
)	
Plaintiff,)	
)	
v.)	Civil No.
)	
Sixteen Thousand, Five Hundred Thirty Eight Dollars)	JURY TRIAL REQUESTED
(\$16,538.00) in U.S. Currency, more or less;)	
)	
One Thousand One Hundred Sixty Five Dollars)	
(\$1,165.00) in U.S. Currency, more or less; and)	
)	
Nine Hundred Fifty Eight Dollars (\$958.00) in)	
U.S. Currency, more or less, all seized from in and around)	
276 Central Street, Manchester, NH,)	
)	
Defendants <i>in rem</i> .)	
_____)	

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM*,
FOR PROPERTY WITHIN THE UNITED STATES' POSSESSION, CUSTODY
OR CONTROL PURSUANT TO SUPPLEMENTAL RULE G(2)**

Plaintiff, United States of America, brings this complaint in accordance with
Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty and Maritime Claims,
and alleges:

NATURE OF THE ACTION

This is an action to forfeit and condemn to the use and benefit of the United States of
America the following properties: (A) Sixteen Thousand, Five Hundred Thirty Eight Dollars
(\$16,538.00) in U.S. Currency, more or less; (B) One Thousand One Hundred Sixty Five Dollars
(\$1,165.00) in U.S. Currency, more or less; and (C) Nine Hundred Fifty Eight Dollars (\$958.00)
in U.S. Currency, more or less, all seized from in and around 276 Central Street, Manchester,
New Hampshire, pursuant to 21 U.S.C. § 881(a)(6).

JURISDICTION AND VENUE

Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant *in rem* properties under 21 U.S.C. § 881. This Court has jurisdiction over this action under 28 U.S.C. §§ 1355, 1395. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355, 1395.

THE DEFENDANTS IN REM

The defendants *in rem* are: (1) Sixteen Thousand, Five Hundred Thirty Eight Dollars (\$16,538.00) in U.S. Currency, more or less; (2) One Thousand One Hundred Sixty Five Dollars (\$1,165.00) in U.S. Currency, more or less; and (3) Nine Hundred Fifty Eight Dollars (\$958.00) in U.S. Currency, more or less, all seized from in and around 276 Central Street, Manchester, NH. The Federal Bureau of Investigation (FBI) has custody of the defendants *in rem*.

FACTS

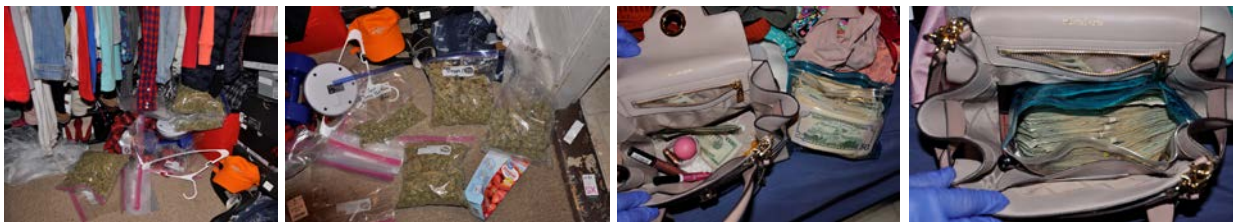
1. On July 15, 2020, a fatal shooting occurred at 276 Central Street Manchester, New Hampshire, the home of Isaiah Rivera-Perez (“Rivera-Perez”) and his wife, Tiffany Raymundo (“Raymundo”). The incident involved an apparent home invasion, which Rivera-Perez foiled. He fired shots at the intruders as they fled from the home, killing one of them.

2. On July 17, 2020, law enforcement officers executed a search warrant at the residence. They found a package of THC gummies and edibles inside a box on the driveway, which also contained defendant *in rem* (2) \$1,165.00 in U.S. Currency, more or less. During the search of a bedroom belonging to Raymundo’s mother, officers found and seized: One Smith & Wesson, M&P, .380, SN KHM9415 and one gun case with a .380 magazine, in a bureau drawer; a .380 magazine with five .380 rounds (loaded in backwards), in the top left drawer of the bureau; and a box of 45 .380 Remington ammunition, from the bottom left drawer in the bureau.

3. During the search of the home office, officers found and seized: One Smith & Wesson, MP Shield, 40 cal. pistol from the desk; edible packaging; the defendant *in rem* (3), \$958.00 and a ledger from the closet shelf; approximately 348.7g of suspected marijuana, .40 cal. ammo, and a gun box with magazine from the closet; \$120.00 from the chair, \$20.00 from the floor; \$2.00 and approximately 87g of suspected marijuana from the floor behind the desk, and packaging materials and approximately 30g of suspected marijuana from the bookcase.

4. During the search of a home cosmetic studio, officers found and seized \$2,397.00 in U.S. Currency: \$300.00, \$215.00, and \$1,266.00 from cube drawers; \$370.00 from under the diffuser on the cube drawer unit; \$21.00 from the top of an eyelash cart, and \$225.00 from the bottom of an eyelash cart.

5. During the search of Rivera-Perez and Raymundo's bedroom, officers found and seized: \$121.00 from under the mattress, \$666.00 from the top left dresser drawer; \$9.00 on & in plastic bin; \$65.00 from the top drawer of the nightstand; \$13,071.00 from inside a pink and white purse hanging on the inside of the closet door; approximately 85.25g of suspected marijuana, a scale & baggies, and \$67.00 from inside the closet.



6. Officers combined fifteen separate amounts of currency into the defendant *in rem* (1) Sixteen Thousand, Five Hundred Thirty Eight Dollars (\$16,538.00) in U.S. Currency, more or less.

7. During an interview with a detective, Raymundo said that she earns money applying eyelashes for friends, charging \$120.00 for a full set and \$60.00 for a fill. Raymundo said she

has kept track of her money on her phone and said she had \$12,617.00, with rubber bands around each \$1,000) in a zip lock bag in a blue bag hanging from a doorknob in her bedroom and an unknown amount from last week in her eyelash room (in cubbies and under keyboard). The detective told Raymundo that Rivera-Perez admitted to selling THC edibles. Raymundo denied knowledge of edible sales. The detective told Raymundo that Rivera-Perez said he told her to move her money to his brother's house before the police arrived. Raymundo said that she did not hear Rivera-Perez say that, and denied taking any money from the house.

8. Officers reviewed a pink apple iPhone 8 plus belonging to Raymundo. A keyword search for "edibles" revealed an iMessage conversation between "Tiffany Raymundo" and "Eloisa" dated April 14, 2020. During the conversation, "Eloisa" asked Raymundo if "Isaiah" had edibles. Raymundo and Eloisa then agreed to meet to arrange a purchase.

9. When DEA asked Raymundo for copies of records to support her business sales, Raymundo admitted that she did not claim the income on her tax returns.

10. The State of New Hampshire charged Rivera-Perez with Second Degree Murder on August 17, 2020. He is awaiting trial.

FIRST CLAIM FOR FORFEITURE
21 U.S.C. § 881(a)(6)

11. The allegations contained in paragraphs 1 through 9 of this Verified Complaint for Forfeiture *in rem* are incorporated by reference.

12. Title 21, U.S.C. § 881(a)(6) subjects to forfeiture "all moneys ... or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or ... all proceeds traceable to such an exchange and all moneys ... used or intended to be used to facilitate any violation of" the Controlled Substances Act.

13. The defendants *in rem*, were furnished or intended to be furnished in exchange for a controlled substance, in violation of the Controlled Substances Act, 21 U.S.C. § 801, et seq., or represent proceeds traceable to such exchanges, or money used or intended to be used to facilitate violations of the Act. As a result, the defendants *in rem* are liable to condemnation and forfeiture to the United States for its use in accordance with 21 U.S.C. § 881(a)(6).

PRAYERS FOR RELIEF

Therefore, the United States requests that:

- (a) the Clerk of Court issue a Warrant of Arrest in Rem in the form submitted with this Verified Complaint to the United States Marshal for the District of New Hampshire, commanding him to arrest the defendants *in rem*;
- (b) this matter be scheduled for a jury trial;
- (c) judgment of forfeiture be entered; and
- (d) this Court grant the United States its costs and whatever other relief to which it may be entitled.

Respectfully Submitted,

SCOTT W. MURRAY
United States Attorney

Dated: January 5, 2021

By: /s/ Robert J. Rabuck
Robert J. Rabuck
NH Bar # 2087
Assistant U.S. Attorney
District of New Hampshire
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Concord, New Hampshire
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VERIFICATION

I, Derek Feather, being duly sworn, depose and say that I am a Task Force Officer assigned to the Federal Bureau of Investigation, and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture in Rem and know the contents therein, and that the same is true to the best of my knowledge, information and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violations of the controlled substance laws of the State of New Hampshire and of the United States.

/s/ Derek Feather
Derek Feather

STATE OF NEW HAMPSHIRE
COUNTY OF MERRIMACK

Subscribed and sworn to before me this 5th day of January 2021.

/s/ Francine Doucette Conrad
Notary Public

My commission expires on: March 27, 2024